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1 Q. Yeah, at any time.  
 2 A. At any time? I don't recollect.  
 3 Q. I think you testified before but I'm not  
 4 sure, so I apologize, but you weren't aware of any  
 5 bumping policy or practice that the company had for  
 6 nonunion folks; right, nonunion employees?  
 7 A. Not at that time. I didn't know. I think  
 8 since then there have been some changes. I think John  
 9 Jordan moved up to plant manager, then they moved him  
 10 down to some other position.  
 11 Q. It's your testimony that you believe that  
 12 that was part of a bumping policy or practice?  
 13 A. No, they just moved him into that  
 14 position.  
 15 Q. Okay.  
 16 A. You know, they do it at their own free  
 17 will. I think at times they just say this is where I  
 18 want him to go and we are going to put him there. If  
 19 it becomes a irritation and they don't want to do it,  
 20 they don't do it. Just let you go so...  
 21 Q. Do you think the company has the right to  
 22 make those kinds of decisions?  
 23 A. Morally, legally?  
 24 Q. In any respect.

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1 A. In any respect? No.  
 2 Q. In what respects don't companies have a  
 3 right?  
 4 A. Morally.  
 5 Q. When you say morally, what do you mean?  
 6 A. If a guy has been there for 10, 20, 30  
 7 years and it comes time for, you know, they say  
 8 they've got to lay people off, whatever. This guy has  
 9 been doing his particular job all along, he's moved up  
 10 the ladder, and they got a new guy in there, new  
 11 person doing the job, I don't see why they should be  
 12 moving that man in. Morally, I think they shouldn't  
 13 do that.  
 14 Q. So when you say move that man in --  
 15 A. Yup.  
 16 Q. You mean even if that position is being  
 17 held by someone who is what, less senior, that he  
 18 should be replaced by the person that's more senior  
 19 instead of laying that more senior person off?  
 20 A. Yeah, it's like first in/last out, FILO,  
 21 whatever you call it. I think that's a moral thing to  
 22 do. If the guy is performing, if he is doing his job,  
 23 yes.  
 24 Q. Did you ever complain to anyone at the

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1 company there was something wrong morally with not  
 2 doing that?  
 3 A. No.  
 4 Q. Is it your understanding there was a legal  
 5 obligation for the company to do that?  
 6 A. No.  
 7 Q. Now, as far as the January 2000 layoff, do  
 8 you believe that besides you, others had been  
 9 discriminated against on any basis or I should say on  
 10 any illegal basis with respect to their layoff?  
 11 A. During the 2000 -- say that again, please.  
 12 Q. I'm talking about the January 2000 layoff.  
 13 Do you believe that others who you know were also laid  
 14 off at that time, do you believe that they had been  
 15 discriminated against on any basis?  
 16 A. As it turned out, yes, I do.  
 17 Q. Who is that?  
 18 A. Well, Ron.  
 19 Q. Ron Larsen?  
 20 A. Yeah, Ron Larsen, myself, as I looked back  
 21 in retrospect.  
 22 Q. And you said -- well, starting with  
 23 Mr. Larsen, why do you believe he was discriminated  
 24 against?

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1 A. Because he was replaced in his job.  
 2 Q. Who replaced him?  
 3 A. A younger fellow by the name of Bourgeois.  
 4 Q. How do you know that?  
 5 A. Because I was told that.  
 6 Q. Who told you that?  
 7 A. Well, when I was back, when I went back  
 8 in, he was the manager and I think -- yeah, he was the  
 9 manager when I went back in, you know.  
 10 It wasn't immediately after but very  
 11 shortly after he became the general foreman of that  
 12 line, then he became plant manager, then he -- I think  
 13 he did something else.  
 14 Q. So you observed that Mr. Bourgeois did all  
 15 of Mr. Larsen's duties when you returned in February  
 16 of 2000?  
 17 A. Uh-huh.  
 18 Q. You have to answer verbally.  
 19 A. Yes.  
 20 Q. Were there any of Mr. Larsen's duties that  
 21 he didn't do?  
 22 A. I don't know. I don't know. Alls I know  
 23 is he was handling that whole line as Larsen did.  
 24 Q. Do you know how old Mr. Bourgeois was or

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1 working there and that I would come back. I believe  
2 if they let that slide, I think there was enough  
3 feelings around that there would have been a suit  
4 then.

5 Q. Well, they didn't rehire Mr. Larsen; did  
6 they?

7 A. Right, they didn't.

8 Q. He was also an older employee; right?

9 A. Right.

10 Q. So you believe the decision to hire you  
11 into the project engineer position was to avoid a  
12 lawsuit by you?

13 A. That could be part of it, part of it. I  
14 could do the job.

15 Q. In fact, you did do the job; right?

16 A. Yes.

17 Q. Were you qualified to perform the project  
18 engineer position?

19 A. I think I was.

20 Q. Do you believe they would have brought you  
21 back if they felt you were not qualified?

22 A. No.

23 Q. By the way, you didn't have any knowledge  
24 or information that you were brought back in order to

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1 avoid a lawsuit; do you?

2 A. No, sir, I have no knowledge of that. I  
3 said that was a gut feeling.

4 Q. In fact, you were in that position for  
5 over a year; correct?

6 A. What position?

7 Q. In the project engineer position?

8 A. Yes.

9 Q. Was the project engineer position, did you  
10 consider that a demotion from your previous position?

11 A. I would say in a sense, yes.

12 Q. What sense?

13 A. In the sense that I was a manager in the  
14 department going down to the level of engineer but I  
15 enjoyed engineering.

16 Q. Was your rate of pay decreased in the  
17 project engineer position?

18 A. No.

19 Q. How about your benefits?

20 A. No, nothing changed.

21 Q. Were you informed you that would not have  
22 any opportunity for advancement?

23 A. I wasn't informed that but you just knew  
24 it was going to be.

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1 Q. Why do you say that?

2 A. Maybe I shouldn't -- just a feeling.

3 Q. When you returned in February of 2001, who  
4 was performing the functions of the position that you  
5 had had immediately prior to your --

6 A. Tom Scozik.

7 Q. Strike that. I just said February 2001,  
8 and I meant February 2000. So Mr. Scozik was  
9 performing the functions of your most recent position  
10 prior to that layoff?

11 A. He was performing the duties of the  
12 manager of manufacturing, which I was, yes.

13 Q. Anyone else besides him performing your  
14 former duties?

15 A. I don't know.

16 Q. Why do you believe you were laid off in  
17 May of 2001?

18 A. Well, what they told me was I was laid off  
19 because of economic conditions. That's what they told  
20 me.

21 Q. Well, do you believe that?

22 A. At the time, I had. I had to accept it.

23 Q. So at the time you believed it; right?

24 A. I had to accept it. Whether I believed it

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1 or not, I don't know.

2 Q. Well, that was my question.

3 A. At the time you're kind of shocked it  
4 happens because you don't expect it. I was doing my  
5 job. I was doing a good job. And so you don't, you  
6 know, they tell you you get laid off because of  
7 economic conditions.

8 Right now you're in shock. You don't know  
9 what to say. You don't know what to think. You're  
10 just hurt.

11 Q. Okay, but my question is: At the time you  
12 were laid off in May 2001, did you believe what they  
13 were telling you was true or not?

14 A. I don't remember whether I believed it or  
15 not. All I know is I had to accept it because that's  
16 what they told me.

17 Q. So my question is: Now, do you have a  
18 belief as to why you were laid off in May of 2001?

19 A. Yeah, it's in my complaint. They could  
20 have laid off the other young engineer and they were  
21 just clearing out the older people. They cleared out  
22 Billy Brown. Brownie was there a long time, too. I'm  
23 sorry, it's Barry Brown. He was there a long time,  
24 myself. I forget some of the other guys that got laid



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1 have product knowledge; isn't that fair to say?

2 A. Yeah.

3 Q. Even non-engineers had to have at least

4 some degree of product knowledge; is that right?

5 A. Sure.

6 Q. So my question is: I understand you're

7 saying that product engineer and project engineer are,

8 in your opinion, similar positions?

9 A. Yes, because a product engineer is given

10 projects to do. It isn't just although his project

11 might be this whole machine or the whole line, it's

12 still a project. And they are cutting hairs here to

13 define which is which.

14 Q. Do you think there are any differences

15 between the two?

16 A. I don't know. I don't know what product

17 engineer -- I don't know what the difference between

18 them is.

19 Q. Did that position exist when you were

20 employed at the company?

21 A. To my knowledge, no, I don't know.

22 Q. So you don't know of anyone while you were

23 at the company whose title was product engineer?

24 A. I don't know.

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1 Q. Were people -- was there anyone whose

2 title was manufacturing engineer?

3 A. Yes, I believe there was, yeah.

4 Q. Is a manufacturing engineer, the same as

5 product engineer?

6 A. I don't know.

7 Q. What were the duties of a manufacturing

8 engineer?

9 A. I don't know that either.

10 Q. Who in your memory was manufacturing

11 engineer when you were there?

12 A. I'm not sure what his title was but I

13 think and this is -- again, I'm not sure but I think

14 Brault. I think Brault was a manufacturing engineer

15 when he come in but he -- well, I think Brault was but

16 I don't think that was his title then.

17 Q. I'm sorry. What were you going to say?

18 A. I don't think that was his title there.

19 Q. But he was a manufacturing engineer when

20 he was hired by Simonds?

21 A. I think that's his background, if I

22 remember correctly. When we were just having

23 conversation, that's what he said.

24 Q. Do you know what qualifications were

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1 necessary to be a manufacturing engineer at Simonds?

2 A. No.

3 Q. Do you believe you were qualified to be a

4 manufacturing engineer?

5 A. I think I could do it.

6 Q. How can you say that when you just

7 testified that you don't know what either the duties

8 or qualifications were for the manufacturing engineer

9 position?

10 A. Because it all has to do with product and

11 all has to do with a machine that makes the product

12 and all has to do with processing product and I worked

13 at the machine end. I worked at the product end and

14 you had to make the machine make the product and make

15 it in a quality way. And a manufacturing engineer

16 must do the same.

17 Q. But you don't know?

18 A. No, I don't.

19 Q. Do you believe that it was important for

20 someone who performed the position of a manufacturing

21 engineer at Simonds to have experience as a mechanical

22 engineer or a degree in mechanical engineering?

23 MS. ELLIOTT: Objection.

24 A. It would help.

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1 Q. Do you believe that you were as qualified,

2 more qualified or less qualified for the product

3 engineer position as Mr. Duperry at the time that you

4 were laid off in May of 2001?

5 A. I want to say I was as qualified if not

6 more qualified because I was there at the plant. I

7 knew the plant. I know the machines. I know the

8 product.

9 Whatever they asked you to do -- it's

10 amazing. They can change your titles but you do the

11 same thing. They can call you a product engineer.

12 They can call you a project engineer. You do the same

13 thing.

14 Q. Do you know what Mr. Duperry did at

15 Simonds --

16 A. No.

17 Q. -- after your layoff? It's not your

18 testimony, is it, that Mr. Duperry wasn't qualified to

19 be a product engineer; is it?

20 A. No, I'm not claiming that at all. I don't

21 know Mr. Duperry.

22 Q. Same question with Mr. Santoro, do you

23 believe that he was the same, more or less qualified

24 to perform your to perform the product engineer

<p style="text-align: right;">117</p> <p>1 exhibit, which I think is number seven.</p> <p>2 (Alberghini Deposition Exhibit No. 7</p> <p>3 marked.)</p> <p>4 Q. Ask you if you could just, Mr. Alberghini,</p> <p>5 review that document. For identification purposes, it</p> <p>6 says at the top, Simonds Industries, Inc. and position</p> <p>7 title, metallurgical technician. I'd like to ask if</p> <p>8 you had a chance to review that?</p> <p>9 A. Uh-huh.</p> <p>10 Q. And I'd ask you if you believe you, at the</p> <p>11 time you were laid off, qualified to perform the</p> <p>12 duties of that position?</p> <p>13 A. Was I qualified?</p> <p>14 Q. Correct.</p> <p>15 A. As assistant to the metallurgist? I</p> <p>16 probably could have handled it.</p> <p>17 Q. So it's your testimony you could have</p> <p>18 performed each of those functions?</p> <p>19 A. Yeah, I think I could.</p> <p>20 Q. Had you had any experience?</p> <p>21 A. No, but that doesn't seem like it's too</p> <p>22 hard a thing to do.</p> <p>23 Q. Do you know what is required to be a</p> <p>24 metallurgist as far as educational background?</p>	<p style="text-align: right;">119</p> <p>1 perform that position?</p> <p>2 A. With training, probably not qualified at</p> <p>3 that time, no.</p> <p>4 Q. Would you know how to develop and/or</p> <p>5 refine thermal processing techniques?</p> <p>6 A. Would I know how to do that?</p> <p>7 Q. Correct.</p> <p>8 A. Well, I did have it in school. I suppose</p> <p>9 I could go back, look it up, but no.</p> <p>10 Q. I show you Exhibit No. 8 now, ask you to</p> <p>11 review that. Have you seen that document before?</p> <p>12 A. No.</p> <p>13 Q. Were you employed at the same time as</p> <p>14 Mr. Dexter that he was pursuing a mechanical</p> <p>15 engineering degree?</p> <p>16 A. Yes.</p> <p>17 Q. How did you become aware of that?</p> <p>18 A. Just general knowledge.</p> <p>19 Q. Did he tell you?</p> <p>20 A. I don't think so. Well, you mean back</p> <p>21 when he was working as a student?</p> <p>22 Q. Correct.</p> <p>23 A. I don't know if he told me or somebody</p> <p>24 else told me.</p>
<p style="text-align: right;">118</p> <p>1 A. I imagine you can work at it.</p> <p>2 Q. I guess I mean formal education,</p> <p>3 background, other than experience. In other words, do</p> <p>4 you have any knowledge as to what educational</p> <p>5 qualifications are necessary to become a metallurgist?</p> <p>6 A. No.</p> <p>7 MR. SIGEL: Can we mark this as the next</p> <p>8 document.</p> <p>9 (Alberghini Deposition Exhibit No. 8</p> <p>10 marked.)</p> <p>11 Q. Mr. Alberghini, do you know what the</p> <p>12 duties of the metallurgist are or were at the time you</p> <p>13 were at Simonds?</p> <p>14 A. I knew some of the things they did, I</p> <p>15 think, if I can recollect. They took samples, tested</p> <p>16 them for their hardness. Also, check the machines to</p> <p>17 make sure that the temperatures were correct on the</p> <p>18 machines.</p> <p>19 They looked into the metal structure, to</p> <p>20 see if temperatures were correct to say if the</p> <p>21 temperature, you know, the construction of the metals</p> <p>22 was okay for the product, something like that.</p> <p>23 Probably many other duties.</p> <p>24 Q. Do you believe you were qualified to</p>	<p style="text-align: right;">120</p> <p>1 Q. Do you know one way or the other whether</p> <p>2 he achieved that degree? I should say a bachelor's</p> <p>3 degree in mechanical engineering.</p> <p>4 A. I never saw his diploma, if that's what</p> <p>5 you mean.</p> <p>6 Q. Do you know at the time also whether he</p> <p>7 was pursuing with that mechanical engineering degree</p> <p>8 he was pursuing, he was focused in material science?</p> <p>9 A. No.</p> <p>10 Q. Do you know what material science is?</p> <p>11 A. Are you going to explain it to me?</p> <p>12 Q. I'm not the one to ask. So I guess that's</p> <p>13 a no?</p> <p>14 A. No. Well, I could guess at it.</p> <p>15 Q. Okay. Well --</p> <p>16 MS. ELLIOTT: No, don't guess.</p> <p>17 Q. Don't guess. I mean, I'm asking you if</p> <p>18 you know. Did Mr. Dexter, at the time that he was</p> <p>19 there as a student, did he make any contributions to</p> <p>20 your group?</p> <p>21 A. To my group? What group?</p> <p>22 Q. Well, to the engineering group to your</p> <p>23 knowledge?</p> <p>24 A. Did he make contributions?</p>



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1 Q. Correct. Anything significant that you  
2 recall?

3 A. Nothing that I recall. Like I said, he  
4 worked with me on the getting the data and drawing up  
5 those prints and then he left that. He was doing  
6 other things. What else he was doing, actually, he  
7 had his project and I had mine.

8 Q. When you were working with him on that,  
9 did he impress you one way or another with his  
10 abilities?

11 A. I thought he was a very bright boy.

12 Q. Do you have an opinion as to whether you  
13 were as qualified, more qualified or less qualified  
14 than Mr. Dexter to be manufacturing engineer or  
15 metallurgical engineer?

16 A. Do I have an opinion as to that?

17 Q. Correct.

18 A. No. Do I? I don't have an opinion.

19 Q. What were the duties of the engineering  
20 manager?

21 A. Direct the force with corporate goals in  
22 mind.

23 Q. Who did the engineering manager manage?

24 A. Let me see, people. You want to know

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1 people?

2 Q. Positions.

3 A. Positions. He managed the project  
4 engineers, the principal engineers. If I remember  
5 correct, most of them were principal engineers or  
6 project engineers or there was a metallurgist that was  
7 also under him.

8 Q. What is a principal engineer?

9 A. I don't know. It's an engineer at a  
10 different level, I guess, or someone who has been  
11 there longer. I don't know. A lot of times it's just  
12 so they can get a raise or they've got to give them  
13 another name.

14 Q. Do you know what the duties of the  
15 engineering manager were at the time you left the  
16 company?

17 A. Just direct the engineering for us with  
18 the goals of the corporate -- with the goals of  
19 corporate in mind.

20 Q. Who were the engineering managers at the  
21 time that you were at the company?

22 A. There was only one engineering manager  
23 that I was under. That was Steve Niemi

24 Q. Was Steve Niemi himself a mechanical

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1 engineer, if you know?

2 A. Yes, as far as I know, he was.

3 Q. In fact, the engineering manager  
4 supervised the mechanical engineers and manufacturing  
5 engineers; right?

6 A. Yes.

7 Q. So it was important for the engineering  
8 manager to be able to perform the positions of  
9 manufacturing engineer or mechanical engineer if  
10 necessary; right?

11 MS. ELLIOTT: Objection.

12 A. I don't know if that's necessarily true.

13 Q. In your opinion, could you be qualified to  
14 be a manufacturing engineer without being qualified to  
15 be a mechanical engineer or manufacturing engineer?

16 MS. ELLIOTT: Answer it, if you can.

17 A. Really, I don't -- I don't -- repeat the  
18 question.

19 Q. Yeah, could you be qualified to be  
20 engineering manager at Simonds without also being  
21 qualified to be either a mechanical engineer or  
22 manufacturing engineer?

23 A. Yes.

24 Q. If you could explain why you believe that?

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1 A. So long as you're you can handle people,  
2 energize them, there is other words for that but get  
3 them to do their job, know the goals of the company,  
4 know where you're heading, and get the job done  
5 through the people you're directing, that's a manager.  
6 That's what a manager does.

7 To motivate them is what I'm trying to  
8 say. If you're capable of motivating people to do the  
9 work needed, that's what a manager does.

10 Q. Well, would you say that if someone had  
11 experience as a mechanical engineer or manufacturing  
12 engineer, they would be in a better position to manage  
13 those types of position than one who had not had that  
14 experience.

15 MS. ELLIOTT: Objection.

16 THE WITNESS: Okay?

17 MS. ELLIOTT: Go ahead. You can answer.

18 A. If they can't motivate people and know the  
19 corporation needs and whatnot, then they are not  
20 qualified to do it either, whether they have all the  
21 knowledge of mechanical or whatever.

22 Q. Right, let's say they can.

23 A. They can what?

24 Q. Those things being equal, comparing those

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1 two positions, would you say it would be more  
 2 beneficial to have someone who had the experience of a  
 3 manufacturing engineering or mechanical engineer?  
 4 A. That would help.  
 5 Q. I want to show you another document, if we  
 6 can mark that as Exhibit No. 9.  
 7 (Alberghini Deposition Exhibit No. 9  
 8 marked.)  
 9 Q. Ask you if you could review that,  
 10 Mr. Alberghini?  
 11 A.. Okay.  
 12 Q. Do you recognize that document?  
 13 A. Nope.  
 14 Q. Do you know one way or another whether  
 15 that is an accurate reflection of the duties,  
 16 responsibilities, qualifications, education, et  
 17 cetera, required for the engineering manager position  
 18 at Simonds?  
 19 A. That's what it says here.  
 20 Q. Independently of this though, do you know  
 21 one way or another whether that is accurate?  
 22 A. No.  
 23 Q. If I could direct your attention to  
 24 mathematical skills on page two, do you have those

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1 skills that are identified under mathematical skills?  
 2 A. They are probably latent but they are  
 3 there.  
 4 Q. When you say latent, what do you mean?  
 5 A. I have had them.  
 6 Q. Did you have them at the time you were  
 7 laid off --  
 8 A. Sure.  
 9 Q. -- in May of 2001?  
 10 A. Uh-huh, yeah, any engineering course you  
 11 go through this.  
 12 Q. Well, what is correlation techniques?  
 13 A. I can't remember that. I don't remember  
 14 anything of this really, any of it. Well, some of it  
 15 I do. Logarithms.  
 16 Q. What are permutations?  
 17 A. I don't remember.  
 18 Q. Did you know these things?  
 19 A. I believe I did.  
 20 Q. As of May?  
 21 A. Yes.  
 22 Q. So it's your testimony approximately a  
 23 year and half ago, you did know these things but now  
 24 you don't?

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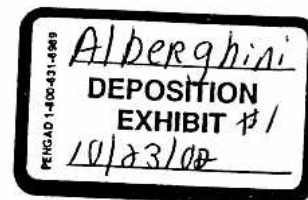
1 A. Sure.  
 2 Q. So in that amount of time, you have  
 3 forgotten?  
 4 A. It would probably be forgotten since I  
 5 didn't use them since I graduated. Since I got out of  
 6 college, I didn't use these things, a lot of them.  
 7 Q. Since?  
 8 A. Since I graduated.  
 9 Q. That was 19 --  
 10 A. It's like riding a bike.  
 11 Q. It's your testimony you haven't used a lot  
 12 of these mathematical concepts or skills since you  
 13 graduated college in 1962? Was it '62?  
 14 A. No, '93.  
 15 Q. I didn't know, when you said graduated  
 16 college. Okay, you're saying when you received  
 17 your --  
 18 A. B.S.  
 19 Q. B.S. in electrical engineering?  
 20 A. That's correct.  
 21 Q. So from that point, from '93 on, you  
 22 didn't use these concepts or skills; right?  
 23 A. That's right.  
 24 Q. Were you at the time that you were laid

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1 off in May of 2001, qualified to evaluate the  
 2 metallurgical lab?  
 3 A. I'm sure I could have.  
 4 Q. How would you go about doing that?  
 5 A. At this time, I couldn't tell you. You  
 6 just evaluate it for whatever purpose you needed.  
 7 Q. So, again, I apologize if I asked you  
 8 this, it's getting late in the day, but could you  
 9 perform each one of these functions for the  
 10 engineering position at Simonds? Were you qualified  
 11 to do that?  
 12 A. This?  
 13 Q. Right.  
 14 A. I believe I could.  
 15 Q. Would you have required additional  
 16 training?  
 17 A. More training to advance my knowledge,  
 18 sure. I never give that up. Would I require it?  
 19 Q. Right.  
 20 A. In other words, in May of --  
 21 MS. ELLIOTT: Make sure you look at the  
 22 job description.  
 23 Q. In May of 2001 --  
 24 A. May of 2001.



LOUIS P. ALBERGHINI  
188 Lancaster Road  
Berlin, Massachusetts 01503  
(617) 838-7368



OBJECTIVE

To become associated with a company that will challenge my creativity, utilize my various skills and provide the opportunity for advancement.

EMPLOYMENT BACKGROUND

October, 1980 - Present: Nypromas, Nypro Inc. *Res. for plant 200,000 sq. ft. Sup. 5 or 6*

Electrical Maintenance Supervisor: responsible for the electrical/electronic installation, maintenance, repair and trouble-shooting of all machines and equipment including G.E. and S.C.I. solid state controls; supervision of maintenance personnel. *only one licensed No lock out - tag out feel undervalued & frustrated*

May, 1976 - August, 1980: Chase-Walton Elastomers, Inc.

Plant Maintenance Supervisor: responsible for the hiring and supervision of all maintenance personnel (3-6); design, build and maintain machinery as needed; maintain electrical, plumbing and steamfitting facilities in plant; supervise boiler room operations; purchasing of maintenance supplies.

Reason for leaving: Lay-off - Economic Conditions.

1959 - 1976: Member in good standing of Local 259 (I.B.E.W.)  
Salem, Mass.

Worked primarily for T.M. Ralph Company; for eight of the seventeen years, I was a foreman electrician (5-22 people).

SPECIAL OCCUPATIONAL EXPERIENCES

Instructor: Fourth year students, apprenticeship program at IBEW Local 259. Course instruction included basic electronics, advanced motor control and touched on logic control.

Instructor: Massachusetts Electrical Code - Salem High School - Evening Division.

PERSONAL DATA

Date of Birth: August 30, 1940

Married, three sons

Excellent health

Interests: Avid sports fan; manager of Lou Gehrig Baseball (4 years); Ice Hockey; Webelo father (4 years); camping; canoeing; bicycling; and electronics buff.

#### EDUCATION

Danvers High School - 1958  
Merrimack College, Evening Division  
Assoc. Degree in Electrical Engineering, 1962. 2/15/80

#### SPECIALIZED AREAS OF EDUCATION

Mass. Electrical Journeyman's License, 1962  
Mass. Master's Electrician's License, 1979  
Completed course in electrical estimating, Estimatic Corp.  
Home study courses in Radio & Television repair (N.T.S.).  
Had OJT training in arc welding.  
Second Class Fireman's License, 1976  
University of Rhode Island College of Business Administration,  
(three day seminar), Preventive Maintenance, 1979  
Completed course in Industrial Fluid Power I at Knox-Norton  
Corporation, 1978  
Seminar: Management Principles & Supervisory Techniques,  
Dr. Michael Jones, Habitat, Inc. (six days), 1979  
Completed course in Digital Systems I at Assabet Valley  
Vocational School, 1981

Salary: Negotiable

#### REFERENCES

Mr. Roger W. Gill, Principal - Chase-Walton Elastomers, Inc.  
Others upon request.